

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

J
FILED BY _____ D.C.
2000 APR -6 AM 10:26
CLERK, U.S. DIST. CT.
S.D. OF FLA - MIA

Case No. 00-6016-Civ-Ungaro-Benages
Magistrate Judge Brown

SAINTIL SAINTILUS

Plaintiff,

v.

NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL
COMPANY

Defendant.

NAMASCO'S MOTION TO CONTINUE TRIAL

Defendant, NAMASCO CORPORATION and NAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY ("Namasco"), pursuant to Local Rule 7.6,
respectfully moves this Court to enter an Order removing this matter from the
December 4, 2000 trial docket and rescheduling it for the trial term commencing in
February 2001 (or as soon thereafter). In support thereof, and as good cause,
Namasco states:

1. This matter is set for a jury trial during the two-week trial term
commencing on December 4, 2000. A pretrial conference is scheduled for
November 17, 2000.

2. The associate assigned to this matter, Jennifer J. Ator, is getting
married on November 25, 2000. Moreover, Ms. Ator is expecting to be on her

honeymoon sometime between December 11, 2000 and January 1, 2001. Ms. Ator will be unavailable until after the New Year's holiday to prepare for and attend a trial.¹

3. Ms. Ator is the attorney that was primarily responsible for Namasco's response to Charge of Discrimination and is managing the litigation for Mr. Kolinski, who has a busy trial schedule. Accordingly, Namasco would be prejudiced if Ms. Ator was unable to prepare for and attend trial.

4. Namasco respectfully requests that the Court remove this case from the December 4, 2000 trial period.

5. This brief extension of less than two months will not unduly prejudice Plaintiff, since this case was filed on December 10, 1999 and was served on December 15, 1999.

6. Undersigned counsel contacted Plaintiff's counsel, who has no objection to the continuance.

7. Attached hereto is a proposed Order.

WHEREFORE, Namasco respectfully requests that its motion be granted, and for such other relief that the Court deems proper and necessary.

¹ Ms. Ator's affidavit in support of Namasco's Motion to Continue Trial is attached at Tab 1.

CERTIFICATION

Undersigned counsel hereby certifies that Namasco has been informed of, and consents to, this motion.

Respectfully submitted,

SHUTTS & BOWEN, LLP
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BY: Jennifer J. Ator
John T. Kolinicki
Florida Bar No. 307971
Jennifer J. Ator
Florida Bar No. 0120911

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was *mailed* this 4 day of April, 2000 to **JOHN D. AMEEN, ESQ.**, Ameen & Drucker, P.A., 3111 University Drive, Suite 608, Coral Springs, Florida 33065.

Jennifer J. Ator
OF COUNSEL